

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

SANDRA LITTLE COVINGTON, et al.,)	
)	
Plaintiffs,)	
v.)	1:15-CV-399
)	
THE STATE OF NORTH CAROLINA, et al.,)	
Defendants.)	

SPECIAL MASTER'S FEE STATEMENT

Pursuant to the Court's Order of November 1, 2017, (ECF Doc. 206) I am submitting the following fee request for work performed as Special Master in the above captioned case.

Attached please find a statement of hours and expenses for my work and that of my assistant, Professor Patrick Egan.

I incurred \$16,694.50 in expenses and worked 219 hours, which at \$500/hour, amounts to \$109,500. (All my hours are rounded down to the nearest half hour.) With the expectation that my bill will be paid within the month timeframe expressed in the Court's order, I will waive compensation for my expenses and reduce my fee by an additional ten percent, for a total due to me of \$98,500. Professor Egan worked a total of 102.5 hours at a rate of \$250 per hour, amounting to \$25,625 owed to him. Fees can be paid to me at the following address: Professor Nathaniel Persily, Stanford Law School, 559 Nathan Abbott Way, Stanford CA, 94305-8610. Please feel free to contact me if I can provide further information or assistance.

SUBMITTED this 23rd day of January, 2018.

A handwritten signature in black ink, appearing to read 'N. Persily', written over a horizontal line.

Nathaniel Persily

Special Master

Statement of Hours for Work Performed by Nathaniel Persily for Covington v. NC

Date	Hours	Task
27-Oct	2.5	Preparation of affidavit and review of filings
30-Oct	6	Review of Filings and maps
31-Oct	6	Review of new filings and cited precedent
1-Nov	2	Administrative work to acquire technology and hardware
	4	Reviewed earlier court drawn redistricting plans and Covington materials
	2	Review decisions interpreting NC whole county provision
	2	Craft order for special master plan
2-Nov	7	Analyzed existing Senate plan and drew multiple solutions
4-Nov	8	Worked on Senate plan and analyzed house plans
5-Nov	4	Worked on Senate plan
6-Nov	8	Worked on House plans
7-Nov	8	Worked on plans for Guilford county
8-Nov	9	Worked on draft plan and draft report
9-Nov	9	Worked on draft plan and helped create images with Pat Egan
10-Nov	9	Worked on draft plan and helped create images and tables with Pat Egan
13-Nov	3	Prepared plans and report for release to parties
14-Nov	3	Began analyzing incumbency effects of plans
17-Nov	3	Read parties' responses to Draft Plan; Began preparation of final plan and report.
20-Nov	9	Worked on Special Master's Recommended Plan
21-Nov	4	Worked on Special Master's Recommended Plan and Report
	2	Reviewed Parties Replies
	3	Worked on Several Scenarios to deal with incumbency
22-Nov	8	Made final changes to plan to incorporate incumbency, worked on report to explain them
23-Nov	6	Worked to create Guilford Alternatives 1 and 2, continued work on the Special Master's Report
24-Nov	5	Redid Guilford House to accommodate State's objections; worked on Report
25-Nov	8	Wrote Special Master's Final Report
26-Nov	9	Wrote Special Master's Final Report
27-Nov	6	Wrote Special Master's Final Report and developed exhibits
28-Nov	6	Wrote Special Master's Final Report and prepared exhibits
29-Nov	8	Wrote Special Master's Final Report and prepared exhibits
30-Nov	5	Proofread Special Master's Final Report
27-Dec	5	Read Defendants' objections, questions and expert report; began preparing responses.
1-Jan	5	Worked on presentation for hearing
2-Jan	5	Worked on presentation for hearing
3-Jan	7	Travel to Greensboro from Miami; Worked on Responses to Court's Questions in new Order
4-Jan	9	Toured Courthouse; Worked with A/V and Court personnel; Prepared presentation
5-Jan	5	Preparation and Oral argument in court
	9	Travel back home from Greensboro and Preparation of Bill
TOTAL	219.5	x \$500 = \$98,775

Statement of Expenses for Nathaniel Persily for Covington v. NC

Expenses	
Two Maptitude licenses plus NC Data	14000
Hardware	1700
Travel to and from RDU	534.4
Hotel	385.24
Rental Car	74.86
TOTAL	\$16,694.50

PATRICK J. EGAN
14 WASHINGTON PLACE, 11-M
NEW YORK, NY 10003

January 8, 2018

Nathaniel Persily
Stanford Law School
Crown Quadrangle
559 Nathan Abbott Way
Stanford, CA 94305-8610

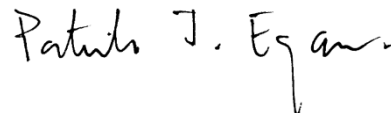
Dear Professor Persily,

Attached please find a bill and a statement of hours related to the work I performed in *Covington v. North Carolina*, developing the tables and images for the Special Master's Draft Plan and Report, the Special Master's Recommended Plan and Report, as well as the related presentation for the Court.

As we discussed, my hourly rate is \$250 per hour and I spent 102.5 hours on the project. The total bill for my work is therefore \$25,625.

You can send payment to me at the address above.

Sincerely yours,

A handwritten signature in black ink that reads "Patrick J. Egan". The signature is written in a cursive, slightly slanted style.

Patrick J. Egan

Patrick J. Egan, assistance to Special Master Nathaniel Persily in *Covington v. North Carolina*

Date	Hours	Task
Nov. 1, 2017	3	familiarize with special master appointment and instructions from court
	0.5	telecon w/NP re planning work process
Nov. 2	0.5	telecon w/NP: planning work process
Nov. 3	0.5	Download and install Maptitude, gather files
Nov. 4	1.5	Familiarize with current plans in place
	4	Setup of Maptitude on laptop, install all map layers
Nov. 5	2	Continue to set up maps
Nov. 9	4	Preparation of maps and statistics for draft plan
	8	Work with NP on preparation of maps and statistics for draft plan
Nov. 10	4	Preparation of maps and statistics for draft plan
	8	Work with NP to finalize maps and statistics for draft plan
Nov. 14	1	telecon with NP to prepare corrected draft plan
Nov. 22	8	Prepare maps and statistics for final recommended plan
Nov. 23	2	Prepare maps for final recommended plan
Nov. 24	6	Calculate statistics for final recommended plan, continue to prepare maps
Nov. 25	4	Prepare maps for final report
Nov. 26	16	Run reports, prepare maps, prepare statistics, and prepare exhibits for final report
Nov. 27	10	Prepare final maps and statistics for report, including for alternate plans
Nov. 28	8	Proofing of statistics and maps; creation of shapefiles and block equivalency files for recomme
Nov. 29	4	Additional proofs and edits to statistical reports for recommended plan
Nov. 30	1	Additional changes to maps and final report
	1.5	Final proofing of report and exhibits
Dec. 19	1	Prepare maps of plans with BVAP at VTD level for Special Master's presentation
Dec. 22	1	Complete BVAP maps for Special Master's presentation
Dec. 28	1	Create comparison maps of CDPs and Municipalities for Special Master's presentation
Jan. 2, 2018	0.5	Data analysis for Special Master's presentation
Jan. 4	1.5	Generate and tabulate report on split municipalities
Total hours	102.5	
Rate	\$250 per hour	
Total billed	\$	25,625